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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RYAN ALLEN SISEMORE,

a/k/a Ryan Allan Sisemore,

VICTOR EASLEY,

OSCAR VARGAS,

RONNIE RICHARD TURNER,

a/k/a Ronnie Allen Turner

a/k/a Ronnie Richard Allen Turner

a/k/a Ronnie Richard Alle Turner, and

FIL FILIMON GUITRON III,

Defendants.

) Case No.14-CR-70886-MAG

)
) STIPULATION AND ~~PROPOSED~~ ORDER
) EXCLUDING TIME UNDER SPEEDY TRIAL ACT
) AND RULE 5.1 FROM AUGUST 14, 2014 TO
) OCTOBER 7, 2014 FOR ALL DEFENDANTS

STIPULATION

Defendants Ryan Allen Sisemore, Victor Easley, Oscar Vargas, Ronnie Richard Turner, and Fil Filimon Guitron III (collectively, the “Defendants”) were charged by complaint in the above-referenced matter in the Northern District of California with conspiracy and possession with intent to distribute a controlled substance, to wit: heroin. Defendants are (or soon will be) placed in residential drug treatment programs the Eastern or Northern Districts of California pursuant to court orders. Over the past month, the Government has produced significant discovery related to numerous drug deals and will produce additional discovery in the form of audio-video recordings in accordance with an agreed-upon stipulation and anticipated, related protective order. Given the recent production and volume of discovery, as well as the difficulty in meeting with clients placed in residential treatment facilities across two districts, the parties hereby request that the preliminary hearing date in this matter be moved from August 14, 2014 to October 7, 2014. The parties make this request time to allow reasonable time for the effective preparation of counsel, as well as time to allow the parties to confer and determine whether a pre-indictment resolution is possible. For the reasons stated, the parties believe that good cause exists to exclude and waive time under Federal Rule of Criminal Procedure 5.1(c) and (d), taking into account the public interest in the prompt disposition of a criminal case and Defendants’ consent.

IT IS SO STIPULATED.

DATED: August 12, 2014

/s/
KATIE BURROUGHS MEDEARIS
Assistant United States Attorney

DATED: August 12, 2014

/s/
ANGELA MILELLA HANSEN
Counsel for Defendant FIL GUITRON, III

DATED: August 12, 2014

/s/
JULIA MEZHINSKY JAYNE
Counsel for Defendant RYAN SISEMORE

1 DATED: August 12, 2014

2 _____
3 /s/
4 ADAM PENNELLA
5 Counsel for Defendant OSCAR VARGAS

6 DATED: August 12, 2014

7 _____
8 /s/
9 SCOTT ALAN SUGARMAN
10 Counsel for Defendant RONNIE TURNER

11 DATED: August 12, 2014

12 _____
13 /s/
14 KENNETH HOWARD WINE
15 Counsel for Defendant VICTOR EASLEY

~~[PROPOSED]~~ ORDER

For the reasons stated by the parties, the Court finds that the aforementioned request is supported by good cause and made with the consent of Defendants. Fed. R. Crim. Proc. 5.1(c) and (d). The Court therefore finds that an exclusion of time between August 14, 2014 and October 7, 2014 is merited under Federal Rules of Criminal Procedure Rule 5.1(c) and (d) and moves the date of the preliminary hearing to October 7, 2014.

IT IS SO ORDERED.

Dated: August 13, 2014


HONORABLE KANDIS WESTMORE
United States Magistrate Judge